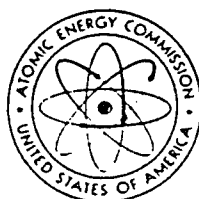


# ENVIRONMENTAL STATEMENT

## *LAND ACQUISITION*

### *Rocky Flats Plant Colorado*

•  
APRIL 1972



UNITED STATES ATOMIC ENERGY COMMISSION

RESPONSIBLE OFFICIAL:

A handwritten signature in dark ink, appearing to read "R. E. Hollingsworth", is written over a horizontal line.

R. E. HOLLINGSWORTH  
GENERAL MANAGER

RETURN TO D. G. Heberlein

WASH-1518

ENVIRONMENTAL STATEMENT

LAND ACQUISITION

Rocky Flats Plant  
Colorado

April 1972

UNITED STATES ATOMIC ENERGY COMMISSION

## TABLE OF CONTENTS

	<u>PAGE</u>
I. SUMMARY . . . . .	1
II. BACKGROUND . . . . .	2
A. Description . . . . .	2
1. Location . . . . .	3
2. Present Facilities . . . . .	3
3. Area Development . . . . .	3
a. Present Development . . . . .	3
b. Potential Area Development . . . . .	6
B. Anticipated Benefits . . . . .	8
1. Preservation of Buffer Zone . . . . .	8
2. Creation of a Greenbelt . . . . .	9
C. Characterization of the Existing Environment . . . . .	9
1. Geology . . . . .	9
2. Hydrology . . . . .	10
3. Meteorology . . . . .	10
4. Ecology . . . . .	11
5. Low-Level Contamination in Soil . . . . .	13
III. ENVIRONMENTAL IMPACT . . . . .	13
IV. ALTERNATIVES . . . . .	14
A. Leasing the Land or Acquiring Easements Restricting Its Development . . . . .	14

	<u>PAGE</u>
B. Refraining From Any Form of Land Acquisition . . . . .	14
V. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS . . . . .	15
VI. RELATIONSHIP BETWEEN SHORT-TERM USES AND LONG-TERM PRODUCTIVITY . . . . .	15
VII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES . . . . .	16
VIII. COST-BENEFIT ANALYSIS . . . . .	16
IX. SUMMARY OF COMMENTS AND INTERACTIONS WITH OTHER AGENCIES . . . . .	17
APPENDIX . . . . .	

ROCKY FLATS LAND ACQUISITION  
ENVIRONMENTAL STATEMENT

I. SUMMARY

This environmental statement has been prepared to comply with the National Environmental Policy Act of 1969 and in support of the U. S. Atomic Energy Commission's proposal for legislative authorization and appropriation covering acquisition of about 4,640 acres of land surrounding its existing Rocky Flats Plant.

The Rocky Flats Plant is a key facility for the fabrication of plutonium components for nuclear weapons, and is therefore an integral part of the national security program. It is located approximately ten miles straight-line south of the Boulder County Court House, ten miles straight-line north of the Jefferson County Court House and sixteen miles straight-line northwest of the Denver City and County Building. The plant site comprises about 2,520 acres of land situated roughly in the center of a presently rural and largely undeveloped fifteen-square-mile area.

This additional 4,620 acre land area will provide a one to one and one-half mile buffer zone around an existing, aesthetically unattractive industrial facility. This facility represents a large capital investment (in excess of \$500 million in replacement value). Although the land to be acquired is presently being utilized primarily for grazing purposes, it is evident that it is on the verge of being developed for residential and industrial uses. It is hoped that Government acquisition of the buffer zone will serve to minimize the types of problems that often arise from proximity of industrial facilities to residential communities.

This buffer zone would serve as an undeveloped open area (i.e., "greenbelt")<sup>1</sup> around the existing industrial facility. Preservation of such an undeveloped area would be desirable

---

<sup>1</sup> "Greenbelt," as used in this environmental statement, is a term used to connote a belt of land intentionally committed to remain in its natural state, free of developments.

in the potentially high-density residential area and would be in line with the recommendations of the Colorado State Environmental Commission. This greenbelt would preserve and enhance the natural ecological state of the land. In parts of the buffer zone where feasible, plantings may be added, possibly in the form of alternate rows of shrubs, bushes, and trees. These belts of sheltering vegetation should upgrade the aesthetic quality of the area, decrease erosion, encourage increased growth of vegetation, and provide shelter for animal life.

Incidental to maintenance of an undeveloped open area, the buffer zone would provide an additional margin of safety in the event of a plant accident, which, although extremely unlikely, cannot be statistically ruled out.

There do not appear to be any adverse environmental aspects to be weighed against the benefits of the proposed acquisition. There are no plans for expansion of plant facilities into the area proposed for acquisition. The proposed action will not measurably alter any resource. No specific cost estimate for the land acquisition is included in this environmental statement. However, the upper limit of acquisition cost would possibly approximate 1% to 2% of the facility replacement value.

The available practical alternatives - not acquiring the land and acquiring less than a fee interest (leasing the land or acquiring easements or enacting land zoning ordinances restricting its development) - could have a less beneficial environmental impact than the proposed action. Acquiring less than a fee interest is adjudged to be less economically attractive in the long run.

In assessing the proposed use, weighing the environmental and other costs against the environmental and other benefits, considering other potential uses of this land resource, and after considering the available alternatives, AEC has concluded that the proposed 4,640 acres of land should be purchased.

## II. BACKGROUND

### A. Description

## 1. Location

The land to be acquired surrounds the existing boundaries of the Atomic Energy Commission's Rocky Flats Plant. The plant is a key facility for the fabrication of plutonium components for nuclear weapons and is therefore an integral part of the national security program. As shown on Figure 1, the plant covers approximately four square miles of land near the northern boundary of Jefferson County, Colorado. The plant is almost equidistant between Boulder (population 66,870), Golden (population 9,817), and Arvada (population 46,814) and is about sixteen straight-line miles northwest of downtown Denver (population 514,678) [Figure 2]. While there are a few ranches, homes, and business activities at nearer locations, the closest population centers of Broomfield (population 7,261), Louisville (population 2,409), and Lafayette (population 3,498) are between six and eight straight-line miles away.

## 2. Present Facilities

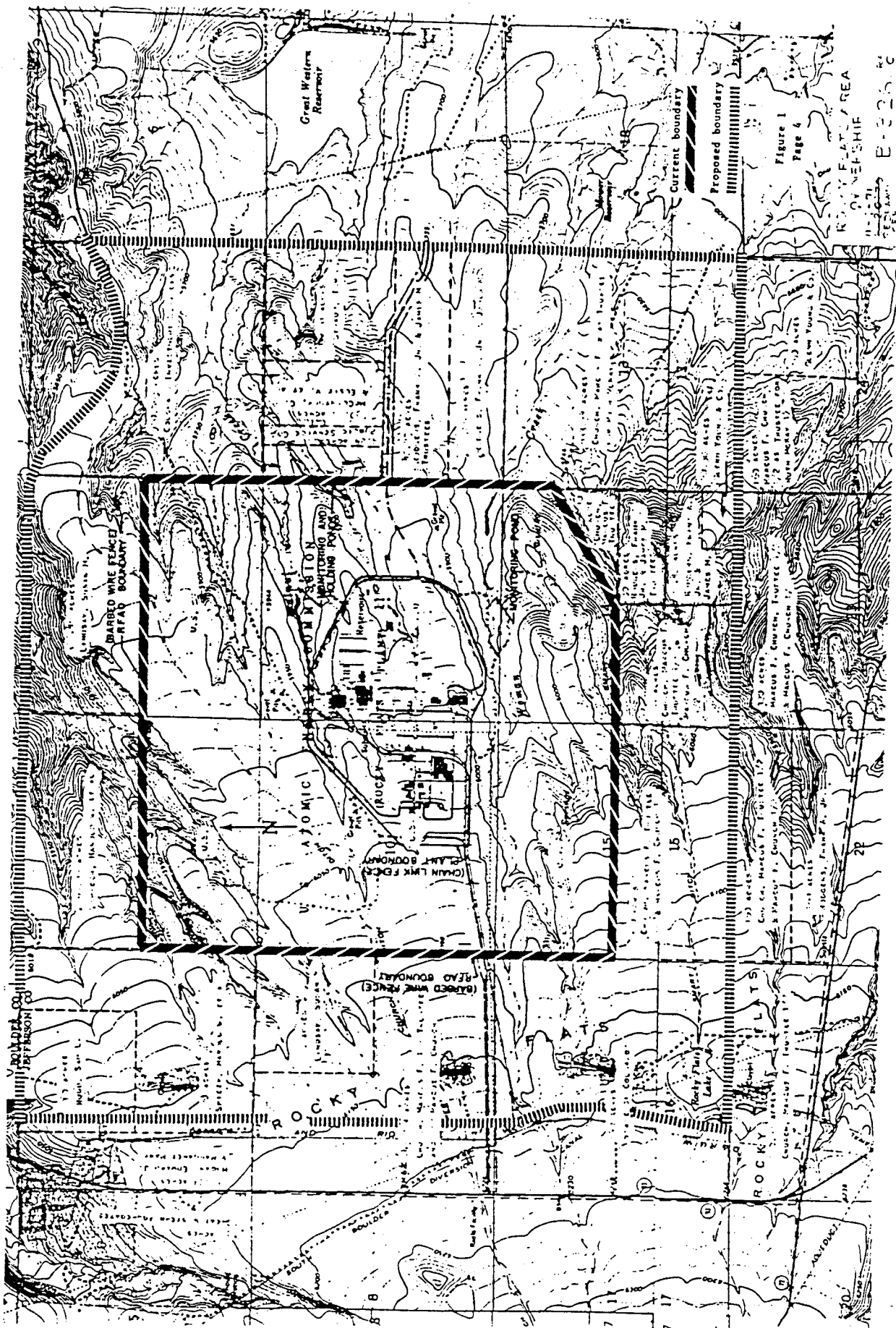
Physical facilities consist of over 50 major buildings plus miscellaneous structures, underground and overhead utilities, roads and parking areas, railroad spurs, and related site improvements. Construction of the plant was started in 1951 and the facilities were put into operation during 1953.

The plutonium fabrication facilities at Rocky Flats represent a large investment (more than \$500 million in replacement value). There are no other plutonium facilities in the United States presently capable of handling the type and volume of fabrication work involved at Rocky Flats - work that is essential to national security needs.

## 3. Area Development

### a. Present Development

- (1) The Oil Shale Corporation established a laboratory in 1968 on a 40 acre site between





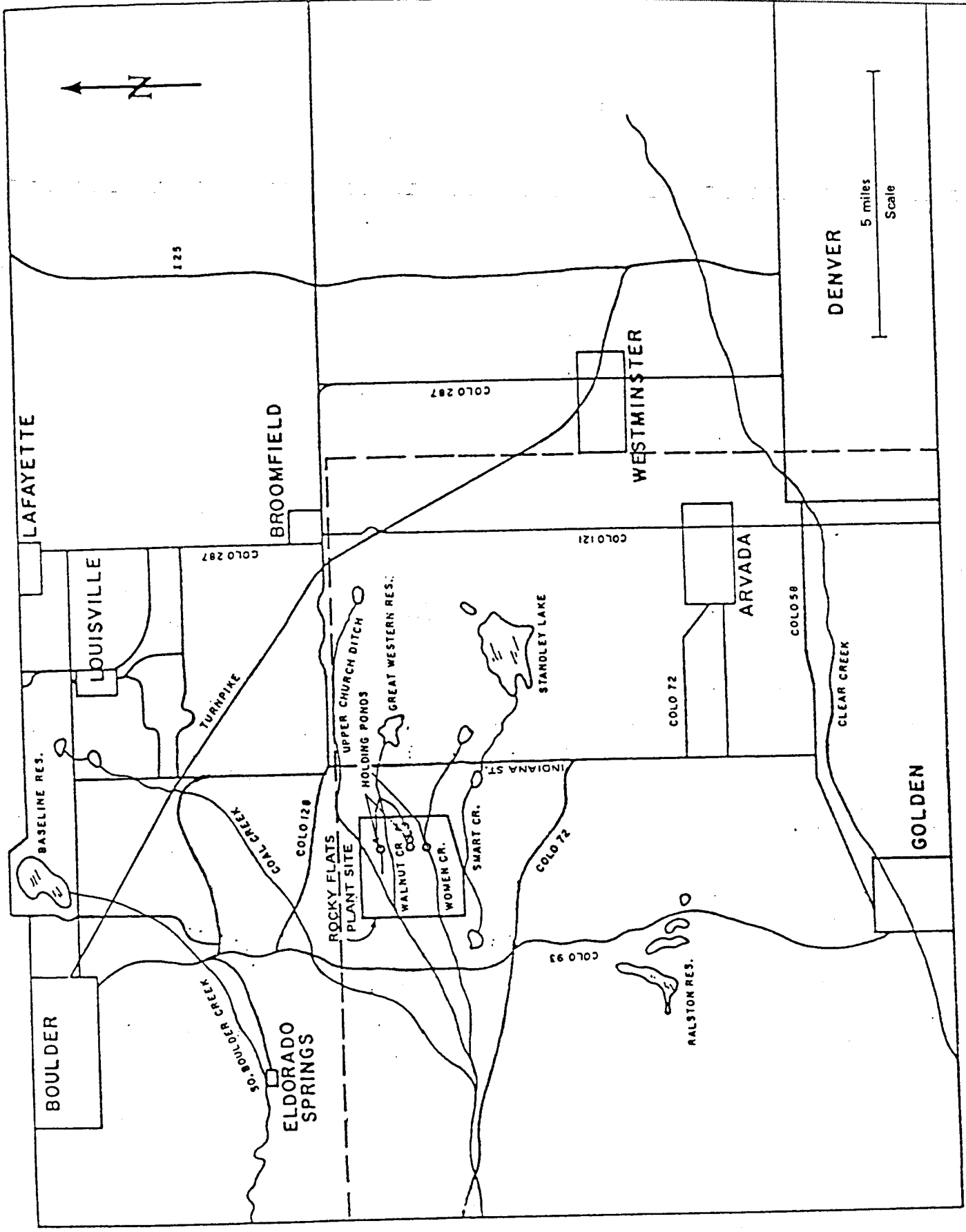


Figure 2

Colorado Highway 72 and the D&RGW tracks about one mile south of the present Rocky Flats boundaries.

- (2) Chemical Specialties, Inc., late in 1967, established a facility immediately east of The Oil Shale Corporation to treat liquid industrial wastes and recover chemicals. This plant is also about one mile south of the present plant boundaries.
- (3) Ideal Cement Company, in 1958, established a light-weight aggregate plant about one mile northwest of the present plant boundaries. This facility was doubled in size in 1965.
- (4) The Jeffco Airport and Industrial Park, which is about three and one-half miles northeast of the plant boundaries, was started in 1950. This development covers about 1,000 acres. Adjacent to the airport site are five commercial enterprises established in the past five years.
- (5) Three claypits are operated just within the western boundary of the proposed acquisition property, on the east side of the D&RGW tracks.

b. Potential Area Development

- (1) The City of Broomfield owns 640 acres of land north, west, and south of the Great Western Reservoir about one mile east of the Rocky Flats Plant. This land was acquired to control surface runoff into the reservoir which is the water supply for Broomfield. It is available for future residential development.
- (2) The City of Westminster acquired land around Twin Lakes in 1969 to control surface runoff into the two lakes which flow into Standley Lake. Portions of this land, amounting to 320 acres, are available for residential development. The Twin Lakes are about one and one-half miles southeast of the present plant boundaries.

- (3) Jeffco Airport golf course is being developed by private individuals on 640 acres just east of Great Western Reservoir.
- (4) An area south and east of the Jeffco Airport golf course was recently zoned residential and approval for housing 12,000 people is being sought.
- (5) The City of Arvada was petitioned by over 200 area residents to annex land bordered by the Rocky Flats Plant's east access road on the north and eastern border of AEC property. Although the petition was rejected, this does not bar resubmission in the future. A second petition requesting utility service in the area was initiated and has also been rejected. The particular area is in the eastern portion of the proposed AEC acquisition.
- (6) The 1,550 acres of land located one-half mile to the west, and one mile to the south of the present plant boundaries were recently zoned industrial. Utilities are available to this acreage.
- (7) A Denver-based Savings and Loan Association purchased 800 acres of land for residential development in September 1971. This is in the northeast corner of the proposed AEC acquisition.
- (8) The annual report, "Jefferson County Recommendations to the Colorado State Highway Commission" dated November 15, 1971, shows AEC's proposed land acquisition completely surrounded by major roads, three of which are indicated as potential freeways. However, the Denver Regional Council of Governments and Colorado Division of Planning are of the opinion that given the present level of urbanization in the area and finances available for highway construction, it is

very unlikely that such freeways will be built in the next ten years. Regional developments and predicted trends are described in recent planning documents.<sup>1</sup>

B. Anticipated Benefits

1. Preservation of Buffer Zone

Inasmuch as the Rocky Flats Plant is an important industrial facility representing a large capital investment, the plant must continue to operate at the present location for the foreseeable future. While the plant is aesthetically unattractive, it is not interfering with nearby community life, due in part to its present isolation with two or more miles of unoccupied lands on all sides. The proposed land acquisition is aimed at preserving a substantial band of that unoccupied land in an open, undeveloped state. Although the land to be acquired is presently being utilized primarily for grazing purposes, it is evident that there may soon be commencement of some land development. Hopefully, the types of problems that often arise from proximity of industrial facilities to residential communities will be minimized through government acquisition of the buffer zone. This buffer zone would also afford an additional degree of control over area access in the event of a plant accident, which, although extremely unlikely, cannot be statistically ruled out.

Real estate activity in the general area indicates that some housing and industry development may soon commence on lands adjacent to the present plant boundaries. Development has been moving steadily closer over the past few years. "For Sale" signs have already been put up on land surrounding the plant site. The Colorado State Planning Commission

---

<sup>1</sup> Colorado Front Range Corridor, published by the Colorado State Planning Commission, Planning Office, September 1969.

has forecast continued rapid development of the Front Range Corridor of Colorado within which the Rocky Flats facility is located.

## 2. Creation of a Greenbelt

If the proposed land acquisition is implemented, the AEC would retain an open space or "greenbelt" in an area which otherwise has a high-density population potential. This greenbelt would preserve and enhance the natural ecological state of the land. To the extent feasible, sheltering vegetation may be added that could upgrade the aesthetic quality of the area, significantly decrease erosion, encourage increased growth of vegetation, and provide shelter for animal life.

There is a growing interest by State and county planners<sup>1</sup> in the location of such a greenbelt to prevent the Cities of Denver and Boulder from merging into a megalopolis. Currently, the most popular location of this belt would be easterly along a line beginning at the east face of the mountains, the Rocky Flats Plant, the Great Western Reservoir, and the Jeffco Airport. The proposed land acquisition would provide a contiguous belt from the D&RGW railroad spur west of the plant to the Great Western Reservoir. Since the proposed Rocky Flats buffer zone lies along the belt recommended by the Colorado State Environmental Commission, its acquisition as open area would be in direct furtherance of their greenbelt concept.

## C. Characterization of the Existing Environment

### 1. Geology

The general land area involved is located at an elevation of 6,000 feet on an alluvial fan-shaped plain of gravel and sand created by water flow out of Coal Creek Canyon. This sloping fan has an approximate radius of five miles and overlies a planed-off bedrock surface called a pediment.

---

<sup>1</sup> The Colorado State Environmental Commission has recommended legislation that would prohibit any population complex in the State from growing beyond 1.5 million persons without creating a wide greenbelt around its boundaries.

The area is underlain by bouldery, sandy gravel, from 25 to 80 feet thick which has a clay layer several feet thick near the base. The gravel is underlain by silty claystone bedrock to a depth of over 500 feet. Ground water occurs principally in the lower part of the gravel and is the source for the water in the springs that emerge at the edge of the pediment at the contact of the gravels and the underlying claystone.

## 2. Hydrology

The land area lies very close to the steep eastern-most slope of the Rocky Mountains, and the flow of water in that area is generally from west to east and northeast.

The area drains through small creeks, which ultimately form a part of the Platte River. There are no natural rivers, large streams, or lakes. The underground water table varies in depth from approximately 9 to 31 feet to the west and from 10 to 36 feet to the east. During the spring runoff and periods of heavy rainfall, the water table rises slightly.

As discussed in the section on Geology, the alluvial gravel contains an apparently continuous layer of impermeable clay in its lower part. This pediment gravel is underlain by the clayey and sandy shales of the upper Laramie Formation at the plant site. These impermeable strata serve as horizontal dams, causing ground water to move laterally where it appears as springs and seeps at the edge of the pediment.

Acquisition of the land and planting of shrubs/trees is not expected to significantly change the drainage or runoff patterns that currently exist. Where the additional vegetation becomes established, it should improve the water retention characteristics to a small extent.

## 3. Meteorology

Precipitation varies, as shown below, with sizeable

wet snows in the early fall and spring. Heavy runoff occurs during the spring thaws in the mountains and consequently through the creek beds that traverse the area.

Average (18 yr.)	15.0 inches
Maximum annual	24.67 inches (1969)
Minimum annual	7.76 inches (1954)

The wind conditions at Rocky Flats are quite variable and are predominantly from westerly quadrants at velocities averaging 7 to 11 mph, with stronger westerly winds of up to 30 to 60 mph during the winter months. Record peak gusts over 100 mph occurred on March 1, 1956, and January 18, 1959, and January 11, 1972.

Average temperatures (18-year period) are:  
Mean + 50° F, Maximum + 77°F, Minimum -22°F.  
A record high of 100°F occurred August 14, 1956, and a low of -26°F on January 12, 1963.

#### 4. Ecology

The plant life found is typical of certain prairie grass land regions.<sup>1 2 3</sup> The rocky surface and limited moisture preclude plowing and the raising of agricultural crops, but grazing on a modest scale is practical. No artifacts or structures of archaeological interest have been discovered or are known to exist within the general area.

- 1 Branson, F. A., Miller, R. F., and McQueen, I. S., 1961. Soil-water Availability and Use by Grasslands on Adjacent Stony and Shale-derived Soils in Colorado, in short papers in the Geologic and Hydrologic Sciences. U. S. Geol. Survey Prof. Paper 425-C.
- 2 Branson, F. A., Miller, R. F., and McQueen, I. S., 1964. Effects of Two Kinds of Geologic Materials on Plant Communities and Soil Moisture: Forage Plant Physiol and Soil-Range Relationships. Amer. Soc. Agronomy Spec. Publ. No. 5.
- 3 Branson, F. A., Miller, R. F., and McQueen, I. S., 1965. Plant Communities and Soil Moisture Relationships Near Denver, Colo. Ecology V. 46.

Characterized as it is, by a sandy, bouldery gravel soil, with a water table that is generally deeper than ten feet, with frequent destructively high winds and broad temperature variations and with limited precipitation, the Rocky Flats pediment is fairly hostile to vegetation. Small trees which have been planted at the Rocky Flats Plant must be watered periodically and must be individually supported with guy-wires as protection against the more severe winds. Therefore, the establishment of sheltering vegetation will certainly be difficult.

The existing vegetation, though quite sparse, shows a distinct distribution pattern around numerous small earth mounds (Murray, 1967)<sup>1</sup>, as well as a density of ground cover that relates to the intensity of grazing. The value of the region for grazing has been reduced as the amount of prickly pear cactus and Spanish bayonet has steadily increased. Exotic weeds, such as the Klamath weed, which causes the skin to blister on white areas of animals exposed to the sun, and cheat grass has further reduced the value of these lands for grazing. Thus, the present carrying capacity of the range is such that grazing is becoming a marginal use. However, where vegetation is protected, it shows rather rapid recovery and is now dominated by big and little bluestem needle grass and side-oats gramma.

The area is frequented by animals classically associated with grassy prairie regions. The most conspicuous small mammals are pocket gophers, ground squirrels, mice, voles, weasels, striped skunk, numerous cottontail rabbits, some jackrabbits, and an occasional coyote. Birds in and around the Rocky Flats area at various seasons include the mallard, pintail, redhead, ringnecked and lesser scaup ducks; red-tailed sparrow; marsh hawks; killdeer; spotted towhee; red-wing black bird; ring-necked pheasant; Northern shrike; American magpie; Western meadowlark; and crow. Amphibians and reptiles include barred

---

<sup>1</sup> Murray, D. F., 1967. Gravel Mounds at Rocky Flats, Colorado. The Mt. Geologist V. 4, No. 3.



tiger salamander, Great Plains toad, boreal chorus frog, Western leopard frog, ornate box turtle, Northern water snake, red-sided garter snake, bullsnake, and Plains rattlesnake.

#### 5. Low-Level Contamination in Soil

A portion of the buffer zone, proposed to be acquired around the current plant site, contains a low-level distribution of plutonium as a result of now discontinued storage operations at the Rocky Flats Plant. This area, which comprises less than one-fifth of the 4,460 acres being procured, lies to the east of and contiguous to the plant boundary. As the result of leakage of contaminated cutting oil from metal drums stored in the southeast corner of the plant site prior to 1967, some contamination of the soil beneath the drums resulted. Before the leaks were discovered, the drums removed, and the area covered with asphalt, some contaminated dirt was blown by the wind across the plant boundary. The AEC and the Colorado Department of Health independently appraised the plutonium contamination around the Rocky Flats Plant in 1970 and concluded that no public health hazard then existed. More comprehensive surveys of plutonium contamination since 1970 have confirmed the absence of public health hazards.

An AEC Health and Safety Laboratory report (HASL-235) of August 1970 entitled "Plutonium in Soil Around the Rocky Flats Plant" plus subsequent quarterly reports published by the Health and Safety Laboratory, provide considerable detail on this situation.

Should the proposed land acquisition be approved, the AEC would utilize part of the land for ecological studies having to do with the behavior and effect of plutonium in the environment.

### III. ENVIRONMENTAL IMPACT

#### Probable Environmental Effects

The acquisition of the additional land needed at the Rocky Flats Facility will cause no deleterious effects on the

environment. Indeed, it should have a beneficial environmental impact. Almost all of the land involved is presently used for the grazing of cattle and horses, even though some portions have been recently zoned for industrial development. A petition for annexation of a part of the area by the City of Arvada was recently denied. Removal of this land from agricultural use for the immediate future (as well as from residential and industrial development) will relieve a problem caused by constant overgrazing through the years by allowing the recovery of natural grasses and wild grains. Consequently, the effects of the acquisition on vegetation and wildlife near the facility should be favorable. The existing natural drainage patterns are not expected to be altered, and the recovery of plant life will significantly reduce the existing water erosion.

The increased natural vegetation which occurs after a cessation in grazing will also reduce wind erosion and the attendant problems of air pollution caused by blowing dust. In addition shelterbelt plantings should significantly decrease wind erosion and damage to the land, and encourage further growth of vegetation and animal shelter.

#### IV. ALTERNATIVES

There appear to be two available alternatives to the proposed action:

##### A. Leasing the Land or Acquiring Easements Restricting Its Development

Although the short-term economic costs of leasing or the acquisition of restrictive easements should be less than acquisition of the proposed land in fee, the economic costs of leasing should exceed those associated with fee acquisition if the plant land is to be held for any appreciable period of time. Control over land use through voluntary restrictive zoning would only offer a temporary assurance since rezoning actions could be taken at any time. Government ownership will provide more effective control over the use of the land than Government lease or acquisition of restrictive easements.

##### B. Refraining From Any Form of Land Acquisition

Refraining from acquiring this land area would permit its use for agricultural, residential, and industrial development.

At the same time, however, it would preclude the preservation of a buffer zone and a green-belt around the plant.

V. UNAVOIDABLE ADVERSE ENVIRONMENTAL EFFECTS

As was indicated in Section III above, the proposed land acquisition will cause no deleterious effects on the environment. Indeed, by removal of this land for the immediate future from agricultural use as well as from potential residential and industrial development, this proposed action should have a beneficial impact on the environment. It will allow for the recovery of natural grasses and wild grains and should result in reduced wind and water erosion.

VI. RELATIONSHIP BETWEEN SHORT-TERM USES AND LONG-TERM PRODUCTIVITY

The short-term use of some land for producing grain and some land for grazing domestic animals would cease. However, the long-term gains in fertility of the land and increased vegetation favorable to expansion of the number of wildlife in the area, are factors offsetting the economic loss of the minimal production which this land is now capable of supporting. The potential dollar cattle return for full utilization of the area is estimated at less than \$9,500 per year, although the area is not now fully utilized for stock grazing. According to the Crops Research Division, Agricultural Research Service, U. S. Department of Agriculture, Fort Collins, Colorado, about 15.6 acres are required to graze one yearling (based on a six month grazing year).<sup>1</sup>

Although residential and industrial development of the specific acquisition area will be precluded at least for the short-term, it is unlikely that Government ownership of this relatively small land area will discourage industrial or residential development in the general area.

---

<sup>1</sup> Bement, R. E., A Stocking-rate Guide for Beef Production on Blue Gramma Range, Journal of Range Management, Vol. 22, No. 2, March 1969, pp. 83-86.

VII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

There would be no irreversible or irretrievable commitments of resources caused by the proposed land acquisition.

VIII. COST-BENEFIT ANALYSIS

The proposed Government acquisition of approximately 4,640 acres of land surrounding the present 2,520 acres of Government-owned land at the Atomic Energy Commission's Rocky Flats facility will provide a one to one and one-half mile buffer zone around an existing aesthetically unattractive industrial facility. This facility represents a large capital investment. Although the land to be acquired is presently being utilized primarily for limited grazing purposes, it is evident that it is on the verge of being developed for residential and industrial uses. It is hoped that Government acquisition of the buffer zone will serve to minimize the types of problems that often arise from proximity of industrial facilities to residential communities.

This buffer zone would be utilized as an open, undeveloped "greenbelt" around the industrial facility. The establishment of such a greenbelt would be desirable in the potentially high-density residential area and would further the recommendations of the Colorado State Environmental Commission. The greenbelt would preserve and enhance the natural ecological state of the land. To the extent it is feasible, sheltering vegetation may be added.

The addition of sheltering vegetation within portions of the acquired land should act to upgrade the aesthetic quality of the area, decrease wind and water erosion, encourage increased growth of vegetation, and provide shelter for animal life.

There do not appear to be any adverse environmental aspects and, therefore, no environmental costs, to be weighed against the benefits of the proposed acquisition. The proposed action will not remove or measurably alter any resource. There are no plans for expansion of plant facilities into the area proposed for acquisition.

The available practical alternatives - not acquiring the land and acquiring less than a fee interest - would have a less

beneficial environmental impact than the proposed action. Not acquiring the land would leave the area open for a probable steady development of industry and residences closer and closer to the Rocky Flats Plant so that the open buffer area would disappear. Acquiring less than a fee interest would preserve the buffer area but it is judged to be less economically attractive, than acquisition of the fee interest.

In assessing the proposed use, after weighing the environmental and other costs against the environmental and other benefits of the proposed action, considering other potential uses of this land resource, and considering the available alternatives, the AEC has concluded that the proposed 4,640 acres of land should be purchased.

#### IX. SUMMARY OF COMMENTS AND INTERACTIONS WITH OTHER AGENCIES

<u>ORGANIZATION</u>	<u>COMMENT</u>
Department of Transportation, Federal Aviation Administration	Proposal has no effect on any plans or existing airports, FAA programs, or safe and efficient use of air space by aircraft.
Department of Transportation, Highway Administration, Region Eight	No specific comment.
Department of Commerce	No specific comment.
Department of the Army, Omaha District, Corp of Engineers	No effect on any existing or potential Corp of Engineers project -- indicates approval of "greenbelt" concept in developing area.
Department of Agriculture, Forest Service	General comment (appears to be a good proposal).
Department of Agriculture, Soil Conservation Service	Points out harsh meteorological and terrain factors and associated difficulty in establishment of tree and shrub wind breaks -- indicates some disagreement with detail of grazing and ecological information contained in draft statement. <sup>1</sup>

---

<sup>1</sup> Attachment to letter is listed as Reference 2 cited on Page 11 of this environmental statement.

## ORGANIZATION

## COMMENT

New Mexico Wildlife and  
Conservation Association,  
Inc.

Concurs in findings and conclusions  
of draft environmental statement.

Colorado Division of Plan-  
ning (includes comments of:  
Denver Regional Council of  
Governments, Regional Plan-  
ning Committee; Jefferson  
County Planning Department;  
Denver Regional Council of  
Governments Staff)

Supports proposed acquisition and  
intended use of land as a greenbelt --  
urges further extension of western  
boundary of proposed acquisition to  
State Highway #93 -- indicates some  
inaccuracies in draft statement  
relative to State Highway plans --  
expresses desirability of a guarantee  
that the land proposed for acquisition  
will remain perpetually an open space --  
considers cost-benefit analysis in-  
adequate due to the lack of inclusion  
of quantitative measures.

Environmental Protection  
Agency

Agrees that acquisition of property to  
provide a buffer zone would create no  
significant environmental impact --  
indicates a belief that proposed buffer  
zone would only slightly reduce con-  
sequences of an accident involving  
release of radioactive material --  
questions whether cumulative capital  
investments of this type may not exceed  
cost of relocating facility -- suggests  
an additional possible alternative of  
securing agreements with municipalities  
to zone subject area against residential  
use.

Response to all the comments listed above has been made in individual  
letters of reply to the reviewing agency or organization. The in-  
coming letters of comment and the corresponding AEC letters of response  
are attached as Appendix A. In the majority of instances the text of  
the final statement has also been changed to accommodate the specific  
point and reflect the AEC's position.

In addition to the interactions with other agencies indicated by  
the written comments, other activity has taken place. A horti-  
culturist at Colorado State University has provided a list of trees

and shrubs that could be used in the area as well as ground rules to be followed in developing shelterbelts. The Regional Forester was contacted and visited the Rocky Flats Plant property. He will assist in developing a shelterbelt program and has proposed a pilot plan for a test plot which will make use of 560 seedlings of ten different species. Application has been made to the State of Colorado for a license to use water from an existing well for irrigation of the test plot. Arrangements have also been made with some of the staff at Colorado State University to perform wind tunnel experiments on an existing model of the Rocky Flats area. These experiments will be performed to help determine both the thickness and spacing of the plantings for best location of shelterbelts to reduce wind erosion.

In late March 1972 a meeting was held at Rocky Flats. The purpose of the meeting was to initiate some planning as far in advance as possible for the best utilization of the real estate in case it is acquired. This meeting was attended by representatives of the AEC, Dow Chemical, Washington and Regional Office representatives of the Bureau of Outdoor Recreation, the North Jefferson County Park Commission, and the Colorado State Game, Fish, and Parks Commission. The AEC representatives pointed out that the AEC has requested funds to acquire the property, but must await Congressional action prior to any firm commitments on future utilization of the property. As an outcome of this meeting the Bureau of Outdoor Recreation indicated they would (1) counsel the AEC as to recreational uses that might be appropriate for the property (2) evaluate the need for such recreational facilities in the area (3) identify local agencies capable of and willing to operate such recreational facilities; and (4) develop a recommended land use plan for the area.

APPENDIX A

COMMENTS FROM FEDERAL AND  
OTHER AGENCIES AND AEC'S RESPONSES



APPENDIX A

INDEX

	<u>PAGE</u>
<u>Commenting Agency</u>	
Agriculture	
Forest Service . . . . .	A-1
Soil Conservation Service . . . . .	A-1
Army . . . . .	A-4
Colorado Division of Planning . . . . .	A-6
Commerce . . . . .	A-14
Environmental Protection Agency . . . . .	A-16
New Mexico Wildlife and Conservation Association . . . . .	A-20
Transportation	
Federal Aviation Administration . . . . .	A-22
Highway Administration (Region Eight) . . . . .	A-24



DEPARTMENT OF AGRICULTURE  
OFFICE OF THE SECRETARY  
WASHINGTON, D. C. 20250

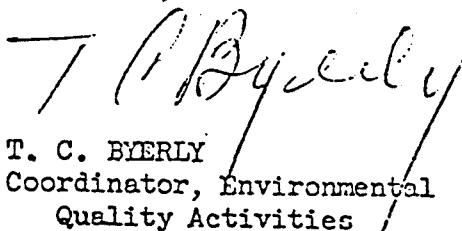
PA 1 02

Mr. Julius H. Rubin  
Assistant General Manager  
for Environment and Safety  
U. S. Atomic Energy Commission  
Washington, DC 20545

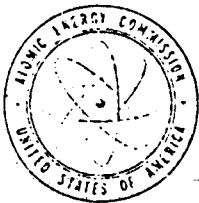
Dear Mr. Rubin:

We have had the draft environmental statement for the Rocky Flats Plant, Colorado reviewed in the relevant agencies of the Department of Agriculture and comments from the Forest Service and the Soil Conservation Service are attached.

Sincerely,

  
T. C. BYERLY  
Coordinator, Environmental  
Quality Activities

Attachments



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

APR 25 1972

Mr. T. C. Byerly  
Department of Agriculture  
Office of the Secretary  
Washington, D. C. 20250

Dear Mr. Byerly:

Thank you for your letter of March 8, 1972, with comments on the draft environmental statement, Land Acquisition - Rocky Flats Plant, Colorado.

The ecology section has been strengthened by the identification of reference material relative to the specific geographic area.

While no housing has been built on the subject land, a large housing development is under construction approximately one mile east and housing is being built on similar plateaus nearer to Boulder. The area is susceptible to winds, but because of the winds and the elevated position, this area is quite smog free. This and the scenic view of both the plains and the mountains make it attractive for residential development.

Only about 480 acres of the 4,640 in question are zoned industrial; the rest is zoned agricultural. According to the Jefferson County Planning and Zoning Department, a residence can be built on a tract as small as five or ten acres under present zoning. Even if the area in question were zoned to preclude all residential and industrial use, zoning of agricultural areas is quite frequently changed to residential as urbanization approaches the area.

We recognize the difficulty in establishing tree and shrub wind-breaks because of the harsh site factors, but believe the establishment of some additional vegetation to be practical. Preliminary investigations have been started to determine the best methods to be used. Contact has been made with a horticulturist at the Colorado State University, the Regional Forester, and the Forester at the U. S. Air Force Academy. Present plans include a trial

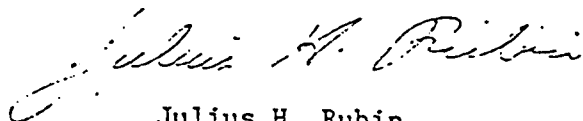
APR 25 1972

planting (probably in May) to determine which species of trees and shrubs will adapt best to local conditions. A total of 560 seedlings of ten different species will be planted and checked at intervals for conditions and survival rate. It is anticipated that assistance of the Soil Conservation Service, Denver, Colorado, will be requested for the development of final plans.

Information derived from the work of Dr. R. E. Bement (U. S. Department of Agriculture) who was recommended by the Adams County Extension Agent, the Boulder Soil Conservation Service, and the Denver Department of Agriculture Office indicates that a 1,000 pound cow needs approximately sixteen acres for six months of grazing (2.63 acres/yearling month) for a maximum return on investment. In addition, the maximum cattle return per year for the particular area approximates \$2.00. On the ideal basis that all of the proposed acquisition area was fully utilized for grazing, it would provide a return of less than \$9,500 per year. Actually, the number of livestock now grazing on the proposed acquisition area has been reported as less than 50, and there is no indication that this number would be significantly increased by the present landowners. As a buffer zone the acquired land would not be grazed by domestic animals. Since there is no intent to expand plant facilities onto any of the proposed acquisition area, the land would not lose its potential as grazing land and it could later be returned to any appropriate private use, including agricultural, whenever the land utilization situation should so permit.

Enclosed are five copies of our environmental statement.

Sincerely,



Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:

Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado (5)



DEPARTMENT OF THE ARMY  
OMAHA DISTRICT, CORPS OF ENGINEERS  
7410 U.S. POST OFFICE AND COURT HOUSE  
OMAHA, NEBRASKA 68102

WROED-PE

3 March 1972

Director  
Office of Environmental Affairs  
Atomic Energy Commission  
Washington, D. C. 20545

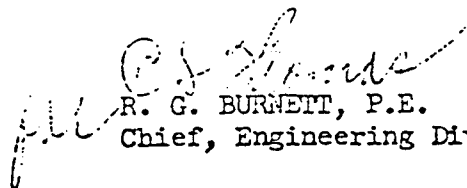
Dear Sir:

This will acknowledge the letter of 2 February 1972, written by Mr. Lyle C. McLaren, transmitting the Atomic Energy Commission's Draft Environmental Statement for Land Acquisition at the Rocky Flats Plant in Colorado.

The proposed action would not affect any existing or potential Corps of Engineers' projects. Inasmuch as the Rocky Flats Plant is a key facility for the fabrication of plutonium components for nuclear weapons, the integrity of the facility must be protected. The "green-belt" in a rapidly developing area is most desirable from the viewpoint of aesthetics and the environment.

We appreciate the opportunity to review and comment on the subject draft statement.

Sincerely yours,

  
R. G. BURNETT, P.E.  
Chief, Engineering Division



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

APR 25 1972

Mr. R. G. Burnett  
Chief, Engineering Division  
Omaha District, Corps of Engineers  
Department of the Army  
7410 U. S. Post Office and Court House  
Omaha, Nebraska 68102

Dear Mr. Burnett:

Thank you for your review and comment on the draft  
environmental statement, Land Acquisition - Rocky Flats  
Plant, Colorado.

Enclosed is a copy of our final statement.

Sincerely,

A handwritten signature in cursive script, which appears to read "Julius H. Rubin", is written over the typed name.

Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:  
Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado

cc w/encl:  
Dr. Richard S. Wilbur  
Assistant Secretary of Defense  
(Health and Environment)  
Department of Defense



John A. Love / Governor

Colorado  
Division of Planning

Department of Local Affairs

1575 Sherman Street / Denver, Colorado / 80203

Phone / (303) 892-2178

March 10, 1972

Mr. Julius H. Rubin  
Assistant General Manager  
for Environment and Safety  
U.S. Atomic Energy Commission  
Washington, D. C. 20545

Subject: Rocky Flats Plant Land  
Acquisition Draft Environ-  
mental Statement

Dear Mr. Rubin:

The Colorado Division of Planning has reviewed the draft environmental statement for land acquisition at the Rocky Flats Plant. It was also referred to the member governments of the Denver Regional Council of Governments. This office is in accord with the statements made by the Jefferson County Planning Department and by the Denver Regional Council of Governments staff, which are enclosed. Other statements may or may not be correct, but should be checked out for accuracy before the final environmental statement is compiled.

Thank you for the privilege of reviewing this statement.

Very sincerely,

Richard L. Brown  
Principal Planner

RLB:l

cc: Denver Regional Council of Governments



# DENVER REGIONAL COUNCIL OF GOVERNMENTS

1776 SOUTH JACKSON STREET - SUITE 200 • DENVER, COLORADO 80210 • 758-5166

March 9, 1972

RECEIVED

MAR 10 1972

DIVISION OF  
PLANNING

Mr. Richard Brown  
Principal Planner  
Colorado Division of Planning  
Department of Local Affairs  
524 State Social Services Building  
1575 Sherman Street  
Denver, Colorado 80203

Subject: EI/003-72 Environmental Impact Statement for Rocky Flats Land Acquisition

Dear Mr. Brown:

Reference is made to your memo and enclosure of February 3, 1972, concerning review of the draft Environmental Impact Statement for the Rocky Flats Land Acquisition in accordance with Section 102(2)(c) of the National Environmental Policy Act of 1969 (Public Law 91-190). In response to your communication, we have notified concerned and affected jurisdictions and agencies in the region and provided them with copies of the draft Environmental Impact Statement. In addition, the Council has reviewed the Statement as it relates to the Council of Governments' concern with areawide planning and development.

Enclosed are the comments that were made on the draft Environmental Impact Statement.

The Council of Governments appreciates this opportunity to be of service to your agency.

Sincerely,

William W. Johnston  
Planning Director

wwj/rae

Enclosure: Comments on EI/003-72

cc: Jack L. Trezise, Jr., COG Representative, Jefferson County  
Robert Kroening, Director, Jefferson County Planning Department  
Larry E. O'Brian, Councilman, City of Arvada  
Andrew McNinimee, Deputy City Manager for Community Development,  
City of Arvada

A 7

#### COUNCIL OFFICERS

EUGENE FORTIER *Secretary-Treasurer*

THOMAS E. KRISTOFELT *Chairman*

GUY R. SANDERS *Vice Chairman*

ROBERT D. FARLEY *Executive Director*

#### EXECUTIVE COMMITTEE

JOHN V. CHRISTENSEN

WILLIAM MCNICHOLS, JR.

GLEN LANCASTER

JOHN P. MURPHY

JACK L. TREZISE



COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT  
ON ROCKY FLATS LAND ACQUISITION

DRCOG FILE NO. EI/003-72

DRCOG Regional Planning Committee

The draft environmental impact statement concerning Rocky Flats land acquisition was reviewed by the DRCOG Regional Planning Committee on March 7, 1972. Presented below is a summary of Committee Members' comments.

Mrs. Romans (City of Englewood): The statement, as presented, does not indicate that consideration was given to other alternatives such as moving the entire existing facility. In addition, the statement does not adequately explain why acquisition of development rights on the property in question would be undesirable. The entire question of drainage and runoff is not handled adequately in the statement.

Mr. Latham (City of Lakewood): The statement is too generalized and does not go far enough in its analysis. The type of terrain and soil conditions that exist in the area precludes rapid development. These things, of themselves, provide controls on natural growth. The environmental impact statement should address itself to how acquisition of the proposed property might fit into a major greenbelt program in the metropolitan area. The Atomic Energy Commission should look into the relationship of this property to such programs as the Boulder Greenbelt Program or the Four Seasons Program of the U. S. Bureau of Outdoor Recreation.

Mr. Paul (Arapahoe County): The cost-benefit analysis presented in the environmental impact statement is totally inadequate.

Mr. Chaney (City of Broomfield): Speaking for myself, I feel that studies should be conducted by the Atomic Energy Commission on alternatives, including moving the existing facility to another location. An adequate judgement on purchase of the land in question cannot be made until such alternatives have been explored.

Mr. McMinimee (City of Arvada): The draft environmental impact statement is not adequate. It ignores location of existing urbanization almost completely. It does not speak to the proximity of urbanization occurring in Jefferson County. There is no guarantee that the acquisition would remain in open space and existing facilities will not be expanded in size. This represents to Arvada a point of real concern. If there could be guarantees made that this would remain open space and undeveloped, Arvada would support the proposed acquisition. One guarantee would be to put the land into some kind of metropolitan, regional or local park system. The statement does not speak to why development rights leases would be less economical in the long run. Further, there are several

inaccuracies in the statement. On page 8, it indicates that the City of Arvada is in the process of annexing a portion of the area. That petition has been rejected by the City. A second petition requesting utility service in the area has been initiated but that petition has also been rejected. The statement should reflect those facts. The statement indicates that 1500 acres one-half mile to the west are zoned industrial and all utilities are available to that area. There are no utilities available at that location.

The City seriously doubts the validity of the statement's cost-benefit analysis. You cannot make a cost-benefit analysis unless you can establish some comparative values and the statement has failed to do that. A commitment to limitation on expansion of the Rocky Flats facility should be made. Finally, the point made by Englewood regarding drainage is valid.

#### Jefferson County Planning Department

The Jefferson County Planning Department enthusiastically supports the proposed acquisition and the intended use of the land as a green belt.

The Department does have the following comments to offer in regard to the draft of the Environmental Statement:

1. On Page 1 we would suggest that since the AEC Plan is located in Jefferson County that a distance from the Jefferson County Courthouse in Golden be included in the second paragraph.
2. On Page 5 depicting the boundaries of the proposed acquisition we suggest and urge that the western boundary of the proposed acquisition be State Highway No. 93 and the proposed Foothills Freeway rather than leaving a rather narrow strip between the highway and the boundary of the Plant. We are enclosing herewith a map of that area of Jefferson County showing proposed freeways. You will note that the Northwest Belt Freeway corridor cuts through the proposed acquisition. Although we would prefer that the proposed acquisition follow the freeway, the precise route of the freeway is not known at this time, therefore, the boundary of the proposed acquisition would meet with our approval at this time.
3. We suggest that the creation of a green belt mentioned on Page 11 include plantings to decrease erosion of gulleys now continuing unabated and also the erosion of unstable soils prevalent in the area.

4. Through personal observation the item on Page 15 concerning animals should also include a herd of deer numbering between 15 and 20.
5. We note that the Plan is contemplating boundaries of the green belt as marked by the future freeway and major arterials in our Major Thoroughfare Plan. We urge the Plan to consider and follow said Plan so that employees will not be traversing through residential areas.

(2-28-72)

DRCOG Staff

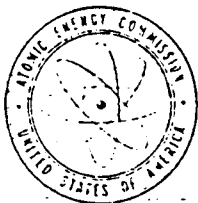
Based on the assumption that the Rocky Flats facility will remain in its present location, the goal of the Atomic Energy Commission in purchasing the additional land surrounding the facility is laudable. The draft environmental impact statement, however, is inadequate in several respects. First, there is at least one inaccuracy in the Statement. On page 10, the Statement indicates that "the Colorado State Highway Commission plans three new freeways in the plant area during this decade." These three new freeways are shown on the Jefferson County Plan, but are not shown on any plans of the Colorado State Highway Commission. Given the present level of urbanization in the area and finances available for highway construction, it is very unlikely that any such freeways would be built during the next ten years.

Second, in order to meet the objective of creating a buffer around the existing facility, the proposed open space area should be guaranteed. There are at least two indications in the environmental impact statement that the proposed open space area may be violated in the future. The statement "removal of this land from agricultural use for the immediate future . . ." on page 17 and the statement later on page 19 that "although residential and industrial development of this specific acquisition are will be precluded at least for the short term, . . ." indicates that there is a real possibility that the land may be utilized by the Atomic Energy Commission for other than open space in the future. In order to adequately establish an open space buffer for the purposes cited in the statement, a guarantee that the land in question will remain perpetually in open space is required.

Finally, the cost-benefit analysis included in the draft statement is inadequate. A cost-benefit analysis without the inclusion of quantitative measures is not a valid analysis and does not meet the objectives of the draft statement. (3-07-72)

March 9, 1972  
rac

A 10



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

APR 25 1972

Mr. Richard L. Brown  
Colorado Division of Planning  
1575 Sherman Street  
Denver, Colorado 80203

Dear Mr. Brown:

Thank you for your letter of March 10, 1972, containing your comments and those of members of the Denver Regional Council of Governments on our draft environmental statement for land acquisition at the Rocky Flats Plant. Those comments have been used to help clarify and strengthen our final statement.

With respect to the question of drainage and runoff, we are confident that there will be no significant change in the existing patterns and have so indicated in the text of the statement. Certainly the expected increase in vegetation should slightly decrease erosion and permit a more orderly runoff.

It is recognized that the rather harsh local terrain and soil conditions tend to influence and slow the rate of land development. However, it is necessary for us to anticipate changes early enough to prevent or minimize the types of problems that often arise from proximity of industrial facilities to developed areas. While we are pleased that petitions, aimed at development of part of the land within the proposed acquisition, have been rejected by local governments at this time, the very existence of these petitions does show that there is an interest in development of this area. Past denial actions by local governments would not necessarily preclude future acceptance nor would it preclude some possible developments over which the local city governments have no authority. Some informal planning and exchange of information have already taken place with reference to integration of the proposed acquisition into an area greenbelt program. Additional informal planning is currently underway and will be expanded and formalized, provided the necessary Congressional authorization for acquisition is granted.

APR 25 1972

There appears to be some misunderstanding with respect to the intent of our cost-benefit analysis. The primary cost to which we have addressed ourselves in the cost-benefit section is the cost to the environment. In the case of this acquisition there appear to be no adverse environmental costs, but rather benefits such as upgrading of the aesthetic quality of the area, decreased wind and water erosion, increased growth of vegetation and improved shelter for animal life. These factors do not lend themselves to quantification but instead are general, rather non-specific items, the values of which are matters of judgment. Note that the proposed action will not involve any irreversible or irretrievable commitments of resources. However, because of the comments indicating a desire for quantitative information, we have added some general information on financial costs to the statement.

By several of their comments the Regional Planning Committee of the Denver Regional Council of Governments (DRCOG) suggested that moving the existing facility to another location should be discussed as an alternative. Relocation of the facility is not an alternative to the proposed land acquisition since the continued operation of the Rocky Flats Plant is in no way contingent upon whether or not the buffer zone is obtained.

The questions expressed by the DRCOG Regional Planning Committee with respect to a lack of guarantee that the acquired land will be kept perpetually in open space is a legitimate concern. We wish through the proposed land purchase to minimize those problems which often confront industrial facilities in developed areas. There are no plans for the expansion of plant facilities into the area proposed for acquisition and that fact has been so indicated in the body of the statement.

Information has been included in the text relative to the location of the Jefferson County Court House with respect to the area proposed for acquisition. In addition, we have indicated that construction of certain of the proposed freeways during the next ten years is unlikely given the present availability of finances.

Mr. Richard L. Brown

- 3 -

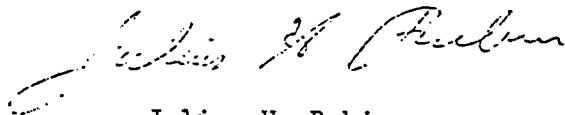
APR 25 1972

Our planning (much of which is based on funding practicability) indicates location of the western border at the D&RGW railroad tracks to be preferable to extending the boundary to State Highway #93. Specifically, the proposed western extent of the acquisition would provide a buffer distance comparable to that being sought in other directions from the Rocky Flats Plant.

More detailed formalized planning will of necessity have to await Congressional authorization of the acquisition. We intend to include consideration of plantings to decrease gulley erosion as well as upgrading the overall ecological aspects of the specific area. Our idea is to make the buffer zone as attractive and useful as possible. We are hopeful that a portion of that area can be made available for public use. We again assure you that there are no plans for expansion of plant facilities into the area proposed for acquisition.

Enclosed is a copy of our final statement.

Sincerely,



Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:  
Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado

cc: Governor John A. Love w/encl.



THE ASSISTANT SECRETARY OF COMMERCE  
Washington, D.C. 20230

February 23, 1972

Mr. Julius H. Rubin  
Room B-312  
Atomic Energy Commission  
Washington, D. C. 20545

Dear Mr. Rubin:

The draft environmental statement titled, "Land Acquisition, Rocky Flats Plant, Colorado," which accompanied your letter of January 25, 1972, has been received by the Department of Commerce for review and comment.

The Department of Commerce has reviewed the draft environmental statement and has no comment.

We are pleased to have been offered the opportunity to comment on the statement.

Sincerely,

A handwritten signature in cursive script, reading "Sidney R. Galler", is written over the typed name.

Sidney R. Galler  
Deputy Assistant Secretary  
for Environmental Affairs



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

APR 25 1972

Mr. Sidney R. Galler  
Deputy Assistant Secretary for  
Environmental Affairs  
Department of Commerce  
Washington, D. C. 20230

Dear Mr. Galler:

Thank you for your review of our draft environmental statement, Land Acquisition - Rocky Flats Plant, Colorado.

Enclosed are ten copies of our final statement.

Sincerely,

A handwritten signature in cursive script, reading "Julius H. Rubin", is positioned above the typed name.

Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:  
Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado (10)



ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D. C. 20460

OFFICE OF THE  
ADMINISTRATOR

MAR 14 1972

Mr. Julius H. Rubin  
Assistant General Manager  
for Environment and Safety  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Dear Mr. Rubin:

In accordance with the National Environmental Policy Act of 1969, we have reviewed the draft environmental impact statement for the proposed Rocky Flats Plant land acquisition and are pleased to provide you with our comments in this letter. We find that the acquisition of property around the Rocky Flats Plutonium Facility for the purpose of providing a buffer zone for residential development will create no significant environmental impact.

It appears to us that the sole purpose of the land acquisition is to establish a federally-owned buffer zone against residential growth. Presumably such a buffer zone would provide an additional factor of safety in the event of a release of radioactive materials from the Rocky Flats Plant. We are not able to evaluate the degree of additional safety that the buffer zone would provide because estimates of possible releases of radioactive materials from the Rocky Flats Plant are not available. It seems to us, however, that the proposed buffer zone would only slightly reduce the consequences of an accident since atmospheric transport processes would spread the contaminants from such an accident over a greater area than the buffer zone.

As indicated in the draft statement, the cost of the proposed land acquisition may be substantial since the property to be purchased is intended for residential and industrial development. Additional capital investments of this type in the present facility could eventually result in the total cost of the plant exceeding the estimated cost of relocating the facility, which is one of the alternatives discussed in the Plutonium Recovery Facility Environmental Impact Statement.

The Environmental Impact Statement does not specify whether the Oil Shale Corporation Laboratory, the Chemical Specialties, Inc., facility and/or the Ideal Cement Company aggregate plant lie within the proposed boundaries. The existence of these facilities might suggest the additional alternative action of securing agreements with the surrounding municipalities to zone the area against residential use.

We will be pleased to discuss any of our comments with you and if we can assist you further in this matter, please let us know.

Sincerely,

A handwritten signature in cursive script, reading "Sheldon Meyers".

Sheldon Meyers  
Director  
Office of Federal Activities



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

APR 25 1972

Mr. Sheldon Meyers  
Director, Office of Federal  
Activities  
Environmental Protection Agency  
Washington, D. C. 20460

Dear Mr. Meyers:

Thank you for your letter of March 15, 1972, reviewing the draft environmental statement, Land Acquisition - Rocky Flats Plant, Colorado.

While establishment of a Federally owned buffer zone to preclude nearby residential development is an essential concern, exclusion of industrial buildup is also desired. Through land ownership the AEC will be better able to ensure control over access to the buffer area and to preclude any permanent occupancy of the area. Your presumption that an unspecified additional safety margin is gained through the land acquisition is correct. As we have noted the additional margin of safety obtained through the land acquisition is a bonus incidental to the preservation of a buffer zone. While the probability of an accident is extremely remote, should it occur, the amount of additional safety provided by the buffer zone is dependent upon a number of variables and its effectiveness could range from slight to 100%.

Relocation of the facility is not an alternative to the proposed land acquisition, since the continued operation of the Rocky Flats Plant is in no way contingent upon whether or not the buffer zone is obtained. While the cost of the proposed land acquisition may be substantial, it is expected to be on the order of 1% to 2% of the replacement cost if relocating the facility were to be considered. No further capital investment for land beyond this current acquisition request is anticipated at the Rocky Flats Plant site.

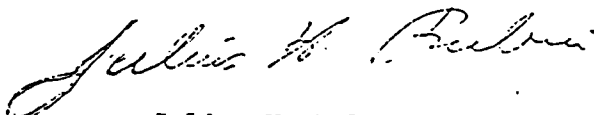
APR 25 1972

With the exception of the claypits which are being actively worked, the activities described under Section 3.a. "Present Development" all lie outside the proposed boundary. In fact, no structures lie within the area proposed for acquisition.

Your suggested additional alternative action of securing agreements with the surrounding municipalities to zone the area against residential use has been considered in the text of the statement as a variation or extension of Alternative A, "Leasing the Land or Acquiring Easements Restricting Its Development." With regard to this point, it appears to us that any restrictive zoning agreement that might be reached by negotiations with municipal zoning authorities would have little assurance of permanency and could be reconsidered at almost any time. In that case the whole problem would reappear and probably with more pressing time considerations. Government ownership of the land is felt to be necessary to ensure the degree and effectiveness of control of the area that is desired.

Enclosed are ten copies of our final statement.

Sincerely,



Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:  
Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado (10)



New Mexico

# Wildlife and Conservation Association, Inc.

*Dedicated to The Conservation of Soil, Forests, Water, Wildlife, and All Natural Resources*

P. O. BOX 1542, SANTA FE, NEW MEXICO 87501

Affiliated with NATIONAL WILDLIFE FEDERATION

March 8, 1972

Mr. W.H. Pennington  
Technical Assistant to the Assistant  
General Manager for Environment and Safety  
US AEC  
Washington, D.C., 20545

Dear Mr. Pennington,

I have reviewed the draft Environmental State concerning the Land Acquisition Rocky Flats Plant, Colorado (Wash-1518). As an Air Force physicist I have worked at Rocky Flats and I am familiar with the operations and locations discussed. I find the presentation clear and concise and I believe that all assertions were supported adequately with the possible exception of the statements concerning the probability of a plant accident. This same statement appears three times in the draft and somehow cannotes a begging of the question. In its present form the statement is nearly like waving a red flag, perhaps omitting all following the word "accident" would be more forthright.

As the New Mexico Representative to the National Wildlife Federation I concur in the findings and conclusions of the draft Environmental Statement.

Yours in Conservation,



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

APR 25 1972

Mr. Fred A. Gross, Jr.  
New Mexico Wildlife and Conservation  
Association, Inc.  
P. O. Box 1542  
Santa Fe, New Mexico 87501

Dear Mr. Gross:

Thank you for your letter of March 8, 1972, commenting upon the draft environmental statement concerning the Land Acquisition - Rocky Flats Plant, Colorado.

Although the semantics of our statement regarding a possible accident may be disturbing to some, it is incumbent upon us to include an assessment of accident possibilities in the environmental statement. It must be emphasized that even though there is some possibility of such an occurrence, the statistical probability of an accident is exceedingly small. Our confidence in this latter point is based upon past experience and upon an active aggressive safety program that exists throughout the AEC. In addition there is a trend toward ever lower levels for the already small accident probability. Should you desire, the AEC would be pleased to furnish additional information about its safety record and about recent assessments of its overall industrial safety status.

Enclosed is a copy of our final statement.

Sincerely,

A handwritten signature in cursive script, reading "Julius H. Rubin", is positioned above the typed name.

Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:  
Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado

DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

ROCKY MOUNTAIN REGION  
LAND ACQUISITION SECTION  
DENVER, COLORADO 80202



Mr. Julius H. Rubin  
Assistant General Manager for  
Environment and Safety  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Dear Mr. Rubin:

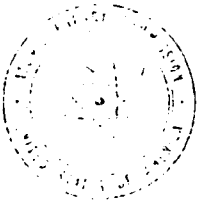
Thank you for the opportunity to review and comment on the Colorado Rocky Flats Plant Land Acquisition proposal and draft Environmental Statement (WASH-1518, dated January 1972).

This proposal will not affect any planned or existing airports, Federal Aviation Administration programs, nor the safe and efficient use of airspace by aircraft operating in the area. Accordingly, we have no comments or recommendations regarding the proposal and draft Environmental Statement.

Sincerely,

A handwritten signature in black ink, appearing to read "M. M. Martin".

M. M. MARTIN  
Director



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

APR 25 1972

Mr. M. M. Martin, Director  
Department of Transportation  
Federal Aviation Administration  
Rocky Mountain Region  
Park Hill Station, P. O. Box 7213  
Denver, Colorado 80207

Dear Mr. Martin:

Thank you for your review of our draft environmental statement concerning the Land Acquisition - Rocky Flats Plant, Colorado.

Enclosed is a copy of our final statement.

Sincerely,

A handwritten signature in cursive script, reading "Julius H. Rubin", is written over the typed name.

Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:  
Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado

cc: Mr. Herbert F. DeSimone  
Asst. Sec. for Environment and  
Urban Systems  
Department of Transportation  
w/encl





U. S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
REGION ~~XXX~~ Eight  
BUILDING 40, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

February 22, 1972

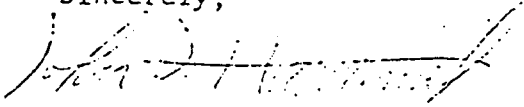
IN REPLY REFER TO  
03-00.26

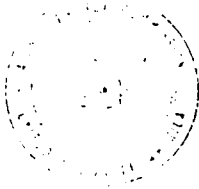
Mr. Joseph J. Dirnunno  
Director, Office of Environmental Affairs  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Dear Sir:

We appreciate the opportunity to review and comment on the draft  
environmental statement concerning land acquisition -- Rocky Flats  
Plant, Colorado. We have no specific comments to offer on the  
statement.

Sincerely,

  
W. H. Saugh  
Regional Federal Highway Administrator



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D. C. 20545

APR 25 1972

Mr. W. H. Baugh  
Regional Federal Highway Administrator  
U. S. Department of Transportation  
Federal Highway Administration  
Region Eight  
Building 40, Denver Federal Center  
Denver, Colorado 80225

Dear Mr. Baugh:

Thank you for your review of our draft environmental statement concerning the Land Acquisition - Rocky Flats Plant, Colorado.

Enclosed is a copy of our final statement.

Sincerely,

Julius H. Rubin  
Assistant General Manager  
for Environment and Safety

Enclosure:  
Environmental Statement on  
Land Acquisition - Rocky Flats  
Plant, Colorado